

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

KEITH RANIERE

Defendant.

Case No. 1:18-cr-00204-NGG-VMS

**EVIDENTIARY HEARING  
REQUESTED**

**ORAL ARGUMENT REQUESTED**

**DEFENDANT’S MOTION FOR LEAVE TO SUBMIT SUPPLEMENTAL AFFIDAVITS  
IN SUPPORT OF RULE 33 MOTION FOR NEW TRIAL**

Keith Raniere, by and through his undersigned attorney, respectfully moves this Court for entry of an Order granting him leave to file supplemental affidavits in support of his Rule 33 Motion for New Trial.

Mr. Raniere’s Rule 33 motion contained all relevant information available to him at the time it was filed. However, in the interim, additional experts have reviewed the evidence on which Mr. Raniere’s conviction was based. They unanimously support the conclusion reached by those experts whose affidavits are already contained in the Rule 33 motion and provide further, new information that this Court should have the opportunity to review before making any ruling. Specifically, further expert review has revealed, among other findings, additional troubling details about the chain of custody of a memory card that contained photographs we now allege to have been illegally modified.

Dated: December 13, 2022,  
Martinez, CA

Respectfully submitted,

/s/ Joseph M. Tully

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